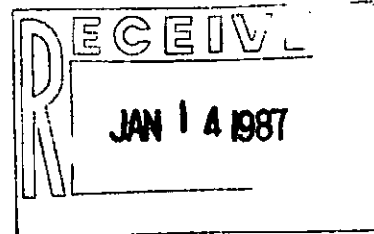


Unocal Corporation
1201 West 5th Street, P.O. Box 7600
Los Angeles, California 90051
Telephone (213) 977-7944



UNOCAL 76

Walter W. Crim
Assistant Counsel

January 9, 1987

*Union Oil Co.
1004*

Gregory A. Roscoe
U.S. EPA
P.O. Box 3254
Reston, Virginia 22090

Re: Cannons Engineering Sites
Union Oil Company-Amsco Audit

Dear Mr. Roscoe:

Enclosed is a copy of the Audit Form Union has prepared after reviewing the documents used by EPA to determine their contribution to the Cannons sites. Based on that review and the information provided by EPA, Union believes the volume transferred to the Bridgewater site should be 52,807 gallons; of this amount, 31,905 gallons were transferred during the period the Plymouth site was open. We represent that these amounts are significantly different from those listed on the draft ranking dated 11/12/76. Those amounts are 82,105 and 61,705 gallons for Bridgewater and Plymouth respectively.

The majority of the apparent discrepancy appears to have occurred as a result of transactions between Cannons and Union during the November-December 1976 period. During this period, Cannons was hired to test and repair a suspected leaking tank. The initial invoice (CAA008 1907) indicated that 28,300 gallons BSW had been disposed by Cannons. Union contested this determination.

Available documents (CAA008 1905), a listing of work performed, indicate that the 28,300 gallons included 13,000 gallons of product transferred between tanks, 12,000 gallons of water disposed of and 3,300 gallons of BSW disposed of. Union paid Cannons for the disposal of 3,500 gallons of BSW (CAA008 1920 & 1924). We do not believe that documents completed in error should be the basis for determining contribution. Based on this discrepancy, this single transaction represents an overstatement



SEMS DocID 640707

Gregory A. Roscoe

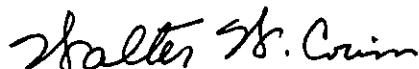
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January 9, 1987

of 24,800 gallons. Other documents received referenced the same transaction or were in duplicate. Since we do not know which documents were used, it is impossible to state the actual reason for further discrepancies.

Should you have any questions or wish to discuss the audit, please contact the undersigned.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Walter W. Crim".

WALTER W. CRIM

WWC/hr
Enclosure

CANNONS CASE RANKED LIST AUDIT FORM

page 1 of 1

Company: Union Oil Company of California (AMSCO)

Total Quantity of Waste Shipments to CEC Bridgewater: 52807

Date(s) of Transaction	Waste Quantity	Waste Units	Waste Type	Transaction Type	Document Type	Document Number	Comments
8/15/75	3200	gallons	BS&W	Tank Cleaning	Daily Work Order	CAA008 2026	
10/6/75	3302	gallons	Solvent	Tank Cleaning	Daily Work Order	CAA008 1997	
12/2/75	4300	gallons	Solids-water	Tank Cleaning	Daily Work Order	CAA008 1968	
1/14/76	3000	gallons	BS&W	Tank Cleaning	Daily Work Order	CAA008 1962	
3/17/76	4800	gallons	Naphtha	Disposal	invoice	CAA008 0645	
3/31/76	3400	gallons	Sludge	Tank Cleaning	invoice	CAA008 2112	
4/2/76	3200	gallons	Solvent	Disposal	Work order	CAA006 0644	
6/8/76	3000	gallons	Tolvene	Disposal	Daily Work Order	CAA008 1958	
6/8/76	8400	gallons	Sludge	Tank Cleaning	invoice	CAA008 2148	
8/30/76	3000	gallons	Solids-water	Tank Cleaning	Daily Work Order	CAA008 2089	
9/15/76	3000	gallons	Sludge	Tank Cleaning	Daily Work Order	CAA008 2092	
10/13/76	3000	gallons	Solvent	Tank Cleaning	Sales Slip	CAA008 2087	
10/14/76	500	gallons	BS&W	Tank Cleaning	Daily Work Order	CAA008 2140	
12/2/76	3500	gallons	BS&W	Tank Cleaning	Invoice	CAA008 1920	
4/29/77	3205	gallons	Naptha	Disposal	Invoice	CAA006 0639	

W. W. Crim, Rm. 1117
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